

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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JUN 19 1997

Federal Communications Commission  
Office of Secretary

In the Matter of )  
 )  
Amendment of Section 2.106 of the ) ET Docket No. 95-18  
Commission's Rules to Allocate )  
Spectrum at 2 GHz for Use by )  
the Mobile-Satellite Service )

To: The Commission

**OPPOSITION OF A. H. BELO CORPORATION**

A.H. Belo Corporation ("Belo"), which through subsidiaries controls eighteen television stations, six of which are in Top-25 markets, hereby respectfully submits its Opposition to the Petition for Partial Reconsideration ("Petition") filed by the "MSS Coalition."

Belo supports the "Comments of the Society of Broadcast Engineers, Inc." ("SBE") to be filed with the Commission on June 19, 1997 in opposition to the MSS Coalition's Petition. As noted by SBE, the Commission based its decision to reallocate at least 20 MHz for Broadcast Auxiliary Service ("BAS") on an adequate record. For example, SBE documents that the 2 GHz spectrum band is congested and is used not only by broadcasters, but also cable systems and cable and broadcast networks. These parties have had to use creative strategies to coordinate the use of the 2 GHz frequencies, especially to cover significant breaking news stories, such as the Oklahoma City bombing trial, or live sporting events. The MSS Coalition points to no new facts to support its contention that even more spectrum can be taken away from BAS consistent with the public interest.

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Further, the Commission correctly concluded that further reduction in channel bandwidth “is too severe to permit FM analog contribution-quality BAS signals,” and that it is inappropriate at this time “to determine whether or when BAS should convert to digital format in conjunction with the development of digital television.”<sup>1</sup> SBE demonstrates that, contrary to the allegations of the MSS Coalition, there are numerous technical reasons why converting from FM video analog to digital transmissions cannot yet occur, including the size, weight and power constraints of portable and mobile electronic news gathering equipment; contribution quality; latency problems; and the high cost and limited availability of digital equipment. Indeed, SBE points to specific examples of how adoption of the MSS Coalition’s proposals would result in significant degradation of mobile camera capability and picture quality, especially with fast-moving news and sports events, to the detriment of the high-quality service the public demands.<sup>2</sup> The MSS Coalition’s Petition simply ignores these real world issues.

As SBE shows, the MSS Coalition’s proposals also would significantly hinder frequency coordination among users. For example, in the Dallas/Ft. Worth market, Belo’s WFAA-TV must coordinate with numerous broadcasters who operate mobile

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<sup>1</sup> First Report and Order, FCC 97-93 (March 14, 1997) at 15.

<sup>2</sup> Contrary to the MSS Coalition’s suggestion, there is insufficient data to confirm that BAS services can operate with digital modulation on channels with less bandwidth than provided for in the Commission’s Order. For example, a demonstration at the 1997 National Association of Broadcasters Convention of a single hop point-to-point 2 GHz microwave set up with 16QAM was not completely reliable. Moreover, it had not been tested in the mobile environment or even with a double hop system. Belo believes that the industry is not ready to supply equipment for BAS with spectrum-efficient digital modulation that is equal or superior to currently-employed technology.

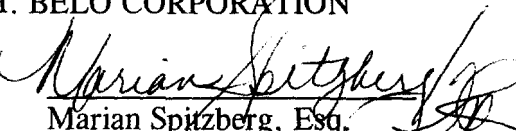
trucks, news helicopters and portable units, in addition to the fixed BAS systems. As a result of the high number of users of BAS frequencies in the market, it is commonplace for two or three mobile trucks concurrently to use the same frequencies with various offsets and polarity to allow the signals to be distributed to different receivers. The market also has four news helicopters capable of 2 GHz transmissions, which place heavy demand on the spectrum, especially for spot news at the top of the hour. The MSS Coalition's proposals would simply exacerbate the already difficult and burdensome coordination problems between BAS users.

In sum, the MSS Coalition reargues issues previously addressed in the First Report and Order, which appropriately concluded on the basis of a complete record that reallocation of at least 20 MHz of spectrum for BAS served the public interest. The Commission therefore should reject the Petition as repetitive and technically flawed.

Respectfully submitted,

A.H. BELO CORPORATION

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June 19, 1997

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of June, 1997, I caused copies of the foregoing Opposition of A.H. Belo Corporation to be mailed via first-class postage prepaid mail to the following:

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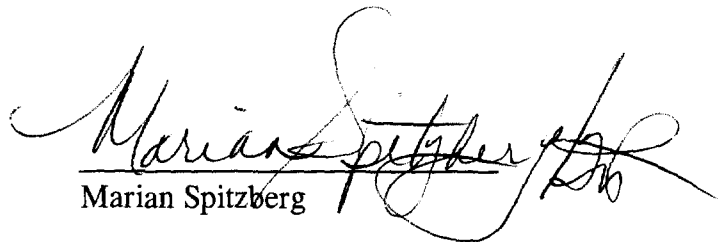
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